



Cantor Colburn LLP

May 23, 2025


VIA ECF

Hon. Jennifer L. Rochon
United States District Court
Southern District of New York
500 Pearl Street, Room 1920
New York, NY 10007

The Court GRANTS the request for the adjournment and extensions of deadlines and conferences as set forth on page two below. The initial pretrial conference is adjourned to **August 19, 2025 at 3:00 p.m.**

Date: May 27, 2025
New York, New York

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge

RE: *Tillo Inc. et al. v. Talli Digital Payments, Inc. et al.*; 1:24-cv-09912; Letter Motion to Adjourn Initial Status Conference and Attendant Case Management Plan and Scheduling Order Deadline

Dear Judge Rochon,

We represent Plaintiffs, Tillo, Inc. and Reward Cloud Limited (collectively, “Tillo” or “Plaintiffs”), in the above-referenced matter, and we write on behalf of both Tillo and Defendant Talli Digital Payments, Inc. (“Talli” or “Defendant”) (collectively with Tillo, “the Parties”). This letter is written to request that the Court temporarily adjourn the Initial Status Conference, currently scheduled for June 5, 2025, as well as the attendant May 25, 2025 deadline for filing a joint letter of counsel to the Court with a proposed case management plan and scheduling order. More specifically, the Parties request the Court to adjourn the Initial Status Conference until a date of the Court’s convenience after July 24, 2025, and that the deadline for the parties to file a joint letter of counsel to the Court with a proposed case management plan and scheduling order be concomitantly extended to June 26, 2025.

This is the second request for adjournment or extensions of time for these deadlines. On March 21, 2025, Tillo moved the Court to adjourn the Initial Status Conference, then scheduled for April 1, 2025, to a date at least 60 days after said date, because Defendant had just been served and had not yet appeared in the matter. (Dkt. No. 8). The Court granted Plaintiffs’ letter motion and adjourned the Initial Status Conference until June 5, 2025. (Dkt. No. 10).

In reaching agreement as to the above proposed adjournment, the Parties have also reached agreement as to the timing of certain upcoming filings related to the pending Motion to Dismiss and/or Plaintiff’s anticipated Amended Complaint filing on May 29, 2025 (*see* Dkt. No. 25). In particular, the Parties have agreed upon, and request that the Court approve of, the following schedule for the below-listed events:



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Event	Parties' Proposed Dates
Talli's Response to Amended Complaint	June 19 th (includes 1 week extension)
Deadline for Parties to Meet & Confer and file Rule 26(f) Report	June 26 th
Tillo's Response to Talli's 6/19 filing	July 10 th (includes 1 week extension)
Talli's Reply in Support of Motion to Dismiss (if applicable)	July 24 st (includes 1 week extension)
Initial Case Management Conference	After July 24 st at the Court's convenience

In support of this letter motion, the Parties state as follows:

1. Plaintiffs filed the Complaint in this matter, through the ECF system, on December 23, 2024, through ECF. (Dkt. No. 1).
2. Defendant was served on March 20, 2025. On April 4, 2025, Defendant received an extension of its deadline to answer or otherwise respond to the Complaint until May 8, 2025. (Dkt. No. 21).
3. On May 8, 2025, Defendant Moved to Dismiss the Complaint. (Dkt. No. 22).
4. In response, Plaintiffs intend to amend the Complaint pursuant to Fed. R. Civ. P. 15(a)(1)(B) on or before May 29, 2025 (*see* Dkt. No. 25). Defendant reserves all rights in respect of Plaintiffs' amended complaint.
5. The Parties request this adjournment so that the Rule 26(f) conference can occur at a time when the Parties are able to consider the impact of the amended complaint and the Defendant's response thereto on the nature and scope of the asserted claims and defenses, as well as the scope of discovery needed. The Parties submit that conducting the Rule 26(f) conference after the above pleadings and/or motions have been filed will permit a more informed meet and confer. This, in turn, will allow the Court to avoid addressing disputes that might have been resolved between the Parties with more time and better preparation for their discussions.



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6. Extension of the deadline for the Initial Status Conference until after July 24, 2025 will further accommodate the Parties' respective counsel's schedules.
7. No party will be prejudiced by this requested continuance, nor will it meaningfully delay resolution of this matter. There is good cause to grant this brief continuance.
8. The Parties have conferred with respect to this proposed request and Plaintiffs and Defendant both consent to this Motion.

WHEREFORE, PLAINTIFFS TILLO, INC. AND REWARD CLOUD LIMITED AND DEFENDANT TALLI DIGITAL PAYMENTS, INC. MOVE THIS COURT TO:

1. ADJOURN THE DEADLINE FOR FILING A JOINT LETTER OF COUNSEL AND PROPOSED CASE MANAGEMENT PLAN AND SCHEDULING ORDER FROM MAY 25, 2025 TO JUNE 26, 2025;
2. ADJOURN THE INITIAL STATUS CONFERENCE FROM JUNE 5, 2025 TO A DATE AFTER JULY 24, 2025; AND
3. ADOPT THE DATES AS SET FORTH IN THE CHART ABOVE.

Dated: May 23, 2025

Respectfully submitted,

By: /s/ Steven M. Coyle
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Certificate of Service

The undersigned hereby certifies that on May 23, 2025, a copy of the foregoing document was filed electronically using the Court's CM/ECF system. Notice of this filing will be sent by operation of the CM/ECF system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail and e-mail.

By: /s/ Steven M. Coyle
Steven M. Coyle, Esq.

*Counsel for Tillo Inc. and Reward Cloud
Limited*